

*Based on our review of the FES, we
do not object to the proposed action.*

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AUG 11 1997

Pablo Cruz
Forest Supervisor
Caribbean National Forest
U.S. Forest Service
P.O. Box 490
Palmer, Puerto Rico 00721

Dear Mr. Cruz:

The Environmental Protection Agency (EPA) has reviewed the Revised Land and Resource Management Plan for the Caribbean National Forest (CNF), Puerto Rico, the accompanying final environmental impact statement (EIS), and the Record of Decision (ROD) on the management plan. This review was conducted in accordance with Section 309 of the Clean Air Act, as amended (42 U.S.C. 7609, PL 91-604 12(a), 84 Stat. 1709), and the National Environmental Policy Act.

In response to comments received on the March 1995 draft EIS and the Proposed Revised Management Plan, the Forest Service (FS) developed a modification of Alternative C entitled Alternative C-mod. This alternative, which is identified in the final EIS as the preferred alternative, reduces acreage for timber demonstration projects, relocates various recreational facilities to avoid impacts on the Puerto Rican Parrot and other endangered species, and drops the proposed designation of the CNF as a municipal supply watershed.

In our July 17, 1995 comment letter on the draft EIS, we reiterated our previous concerns about reconstruction of PR 191 through the CNF because of its potential to cause adverse impacts to habitat and wildlife, and its role in erosion and water quality impacts. We stated that if reconstruction of PR 191 was planned, its impact on the management plan would need to be fully addressed in the final EIS. We note that the Revised Land and Resource Management Plan does not recommend restoration of PR 191, instead proposing to build hiking and/or biking trails across the landslide that closed a portion of the highway. Further, the Plan indicates that an amendment or revision of the management plan would be necessary in order for reconstruction to occur. In this regard, the FS should continue to coordinate with the Federal Highway Administration regarding any plans to reopen PR 191.

The ROD indicates that Alternative C-mod has been selected as the Land and Resource Management Plan. This plan involves the designation of 10,363 acres as wilderness, and recommends six river segments for designation as Wild & Scenic Rivers. We note that many positive alterations have been made to reduce the plan's impact on endangered species and the habitat necessary for their recovery. The amount of road construction and timber harvesting proposed has been reduced, greatly decreasing the potential for land disturbance and the resulting

sediment load to CNF watercourses. The soil erosion and sedimentation plans included in the standards and guidelines in the Final Revised Plan adequately address our concerns.

Although it is unusual for the ROD to be issued concurrently with a final EIS, 40 CFR 1506.10 permits such an approach if the lead agency establishes a formal process that allows other agencies and the public to appeal the decision. We note that Section VI of the ROD states that the Forest Service's decision may be appealed within 90 days of the date of the publication of the legal notice (i.e., July 11, 1997). Accordingly, EPA does not object to this approach to finalize the decision for this project.

Based on our review of the final EIS, we do not anticipate that the implementation of Alternative C-mod will result in significant adverse environmental impacts. Accordingly, we do not object to its implementation.

Should you have any questions concerning our review, please contact Steven Ferreira of my staff at (212) 637-3759.

Sincerely yours,

Robert W. Hargrove, Chief
Strategic Planning and Multi-Media Programs Branch

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